

August 2, 2017

VIA HAND DELIVERY

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington DC 20554

Dear Ms. Dortch:

I, Mike Everhart, the Director of Engineering for Alpha Media., LLC, have reviewed the Comments of Shainis & Peltzman, Chartered which were filed in the above-referenced Docket. I am also familiar with the Petition for Rulemaking filed by Geo-Broadcast Solutions, RM No.

Re:

MB Docket No. 17-105

11659, which is referenced in the Shainis & Peltzman Comments.

Alpha Media, the licensee of over 250 stations in the United States, clearly has a vested interest in the Commission's rules regulating the use of its stations signals in their authorized contours. Alpha agrees with the recent Commission's comments that rules that are archaic because of technological changes or do not help the public interest should be eliminated or amended. We believe that a radio station should be allowed to use its signal to the maximum benefit to the station and the public, as long as it does not violate indecency rules or create interference.

Alpha's station, WIIL-FM, was used for the recent test for Experimental Authority mentioned in the Shainis & Peltzman Comments above. After hearing the results of that test, we have no doubt that the system used to deliver different programming on multiple boosters works and we support the new technology.

I urge the Commission to take whatever steps it deems appropriate to expeditiously modify Section 74.1231(i) of the Commission's rules, allowing for origination of programming on booster facilities. As explained in the Shainis & Peltzman Comments, the public interest benefits are significant.

Sincerely

Michael Éverhart | Director of Engineering | Alpha Media LLC